



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JASON IMBIANO
Tel.: (212) 356-8766
jimbiano@law.nyc.gov

October 21, 2022

VIA ECF

Hon. Mary Kay Vyskocil
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: F.N. v. N.Y.C. Dep't of Educ., 21-cv-11177 (MKV)(GWG)

Dear Judge Vyskocil:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 14-day extension of Defendant's time to respond to Plaintiff's Motion for Summary Judgment (ECF No. 28), from November 1 to November 15, 2022. Plaintiff consents to this request. This is the first request for an extension to reply to Plaintiff's Motion. The requested extension will give the undersigned Defendant's counsel—assigned to this case on October 20, 2022—the necessary time to review Plaintiff's submissions and respond appropriately.

Accordingly, Defendant respectfully requests that Defendant's time to respond to Plaintiff's Motion for Summary Judgment be extended to November 15, 2022.

Thank you for considering this request.

Respectfully submitted,
Jason Imbiano

/s/ Jason Imbiano

Special Assistant Corporation Counsel

cc: Kevin Mendillo (via ECF)